

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**DWIGHT McDONALD, CHRISTOPHER
ATKINS and TIMOTHY PROVOST,
Each Individually and on Behalf
of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 1:21-cv-6260

**M2 MANAGEMENT, INC.,
and MICHAEL P. TRAINOR**

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

Plaintiffs Dwight McDonald, Christopher Atkins and Timothy Provost (collectively “Plaintiffs”), each individually and on behalf of all others similarly situated, by and through their attorneys of Sanford Law Firm, PLLC, for their Motion for Extension of Time to file their Response to Defendants’ Rule 60(b)(4) Motion to Vacate Judgment, state and allege as follows:

1. On May 28, 2025, Defendants filed their Rule 60(b)(4) Motion to Vacate Judgment, seeking to vacate the judgment against Defendants for lack of service.
2. Plaintiffs’ deadline to file a Response is June 11. Plaintiffs respectfully request a one-week extension, making the new deadline June 18.
3. Plaintiffs make this request in good faith; this motion is made for good cause and not for the purpose of delay.
4. Plaintiffs’ counsel has conferred with Defendants’ counsel regarding the extension and this Motion is Unopposed.

WHEREFORE, premises considered, Plaintiffs respectfully request that this Court

enter an Order allowing them an additional 7 days to file their Response to Defendants' Rule 60(b)(4) Motion to Vacate Judgment and for any other relief that the Court deems just and proper.

Respectfully submitted,

**DWIGHT McDONALD, CHRISTOPHER
ATKINS and TIMOTHY PROVOST,
Each Individually and on Behalf of All
Others Similarly Situated,
PLAINTIFFS**

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